

KATHLEEN A. LEAVITT
CHAPTER 13 BANKRUPTCY TRUSTEE
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

IN RE:
URSULA LICHTENSTEIN

Debtor(s)

Case No:-25-10340-NMC

CHAPTER 13

Hearing Date: May 01, 2025

Hearing Time: 1:30 pm

WILDE & ASSOCIATES LLC
Attorney for the Debtor

**TRUSTEE'S OPPOSITION TO CONFIRMATION OF PLAN
#1 COMBINED WITH TRUSTEE'S RECOMMENDATION FOR DISMISSAL**

Comes now KATHLEEN A. LEAVITT, Chapter 13 Bankruptcy Trustee, in the above captioned
bankruptcy case and hereby alleges as follows:

Statement of Facts

The Debtor(s) filed for Chapter 13 relief on 01/21/2025. The Section 341(a) Meeting of Creditors held on
March 11, 2025 at 10:00 am was concluded .

Argument

The Trustee objects to confirmation of the Chapter 13 Plan and recommends that this case be dismissed
pursuant to 11 U.S.C. §1307(c) for one or more of the following reasons:

- Debtor(s) failed to comply with notice/re-notice requirements. Chapter 13 Plan F.R.B.P. 2002(a) & (b) & 11 U.S.C. §1324(b)
- The Plan fails to meet liquidation value [11 U.S.C. §1325(a)(4)] based on the following non-exempt property: TBD- based on mobile home

- Trustee objects to the exemptions claimed as the exemptions are not allowed under the specified section or the amounts specified exceed the allowable exemption, specifically: NRS 115.010 as 21.090(1) is the appropriate exemptions for bankruptcy. Additionally, it does not appear that the asset is in the Debtor's name and therefore not eligible for exemption of Debtor's interest in equity.

Debtor(s) failed to cooperate with the Trustee as necessary to enable the Trustee to perform her duties pursuant to 11 U.S.C. §521(a)(3), §704 and/or §1302. This failure to cooperate has caused unreasonable delay that is prejudicial to creditors under 11 U.S.C. §1307(c)(1) as the Debtor(s) did not provide the following documents¹ and/or amendments:

- Amendment to Plan: Dkt NO. 23- Wrong case number in caption, tax years should be three years, move IRS to priority section and Trustee will not pay IRS without a proof of claim on file & plan is underfunded; Section 6.2: list lease agreement. .
- Amendment to Schedule G. Executory Contracts and Unexpired Leases: list residential lease agreement per testimony.

Conclusion

WHEREFORE, for the foregoing reasons, the Trustee objects to confirmation and recommends that this case be dismissed pursuant to 11 U.S.C. §1307(c).

Dated: 3/12/25

/s/ Kathleen A. Leavitt
Kathleen A. Leavitt
Chapter 13 Trustee

¹ The Trustee requests that all documents be submitted in a redacted form. Please reference F.R.B.P. 9037 for guidance on the information that should be redacted.

KATHLEEN A. LEAVITT
CHAPTER 13 STANDING TRUSTEE
711 S 4Th Street
Suite 101
Las Vegas, NV 89101

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

IN RE:

**CASE NO: BKS-25-10340-NMC
Chapter 13**

URSULA LICHTENSTEIN

Debtor (s)

CERTIFICATE OF SERVICE

1. On March 12, 2025, I served the following document(s):

**TRUSTEE'S OPPOSITION TO CONFIRMATION OF PLAN #1 COMBINED WITH
TRUSTEE'S RECOMMENDATION FOR DISMISSAL**

2. I served the above-named documents(s) by the following means to the persons

as listed below:

United States mail, postage fully prepaid

URSULA LICHTENSTEIN
505 W HARMON AVE
#305
LAS VEGAS, NV 89103

WILDE & ASSOCIATES LLC
7473 W LAKE MEAD BLVD
SUITE 100
LAS VEGAS, NV 89134

I declare under penalty of perjury that the foregoing is true and correct.

Signed on: 3/12/25

/s/ Esther Carr
Employee of
Kathleen A. Leavitt
Chapter 13 Standing Trustee